

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TQ DELTA, LLC,

Plaintiff,

v.

2WIRE, INC.,

Defendant.

C.A. No. 13-cv-1835-RGA

**FILED UNDER SEAL**

Part 2 of 2

Contains Exhibits 11-20

**DECLARATION OF ANNA M. TARGOWSKA**

I, Anna M. Targowska, an attorney representing Plaintiff TQ Delta, LLC in the above-captioned matter, declare under the penalty of perjury of the laws of the United States, that the following is true to my best understanding and belief:

1. Attached hereto as Exhibit 1, is a summary exhibit showing all asserted claims of the Family 3 patents, including the court's claim constructions.

2. Attached hereto as Exhibit 2, is a true and accurate copy of U.S. Patent No. 8,276,048 to Tzannes (TQD000345 – TQD000356).

3. Attached hereto as Exhibit 3, is a true and accurate copy of U.S. Patent No. 7,844,882 to Tzannes (TQD000233 – TQD000244).

4. Attached hereto as Exhibit 4, is a true and accurate copy of U.S. Patent No. 7,836,381 to Tzannes (TQD000221 – TQD000232).

5. Attached hereto as Exhibit 5, is a true and accurate copy of U.S. Patent No. 8,495,473 to Tzannes (TQD000486 – TQD000498).

6. Attached hereto as Exhibit 6, is a true and accurate copy of Claim Construction Order for Family 3 Patents (Dkt. #454), dated December 28, 2017.

7. Attached hereto as Exhibit 7, is a true and accurate copy of Claim Construction Order for Family 1 Patents (Dkt. #485), dated February 6, 2018.

8. Attached hereto as Exhibit 8 is a true and accurate copy of the Defendant 2Wire, Inc.'s Invalidity Contentions in Response to TQ Delta's July 2, 2018 Final Infringement Contentions, dated August 15, 2018.

9. Attached hereto as Exhibit 9, is a true and accurate copy of the Opening Expert Report on Invalidity of Dr. Krista S. Jacobsen for Family 3 Patents, dated November 28, 2018.

10. Attached hereto as Exhibit 10, is a true and accurate copy of the Rebuttal Expert Report of Dr. Todor Cooklev Regarding Validity of the Family 3 Patents, dated December 28, 2018.

11. Attached hereto as Exhibit 11, is a true and accurate copy of the Corrected Rebuttal Expert Report of Dr. Todor Cooklev Regarding Validity of the Family 3, Patents, dated January 4, 2019.

12. Attached hereto as Exhibit 12, is a true and accurate copy of the Reply Expert Report of Dr. Krista S. Jacobsen for Family 3 Patents, dated January 18, 2019.

13. Attached hereto as Exhibit 13, is a true and accurate copy of the Deposition Transcript of Krista S. Jacobsen, Ph.D., taken on February 6, 2019.

14. Attached hereto as Exhibit 14, is a true and accurate copy of LB-031 (2WIRE00030957 – 2WIRE00030963), dated June 14, 2004.

15. Attached hereto as Exhibit 15, is a true and accurate copy of U.S. Patent No. 7,269,208 to Mazzoni (TQD032606 – TQD032619).

16. Attached hereto as Exhibit 16, is a true and accurate copy of U.S. Patent No. 5,751,741 to Voith (TQD029267 – TQD029279).

17. Attached hereto as Exhibit 17, is a true and accurate copy of U.S. Patent No. 6,707,822 to Fadavi-Ardekani (TQD024117 – TQD024125).

18. Attached hereto as Exhibit 18, is a true and accurate copy of ITU-T G.993.1 (06/2004) (TQD078440 – TQD078667).

19. Attached hereto as Exhibit 19, is a true and accurate copy of ITU-T G.992.2 (06/99) (TQD037741 – TQD037919).

20. Attached hereto as Exhibit 20, is a true and accurate copy of Family 3 – Defendants’ Disclosure of Claim Terms for Construction and Proposed Definitions, dated May 3, 2017.

Executed on February 22, 2019

/s/ Anna M. Targowska  
Anna M. Targowska